

# EXHIBIT 2

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14 *ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN*

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 ELECTRIC SOLIDUS, INC. d/b/a  
18 SWAN BITCOIN, a Delaware  
corporation,

19 Plaintiff,

20 v.

21 PROTON MANAGEMENT LTD., a  
22 British Virgin Islands corporation;  
THOMAS PATRICK FURLONG;  
23 ILIOS CORP., a California  
corporation; MICHAEL  
24 ALEXANDER HOLMES; RAFAEL  
DIAS MONTELEONE;  
25 SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS  
26 VASCONCELOS,

27 Defendants.  
28

**Case No.: 2:24-cv-8280-MWC-E**

**PLAINTIFF'S SECOND SET OF  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO DEFENDANT  
PROTON MANAGEMENT LTD.**

Judge: Hon. Michelle Williams Court

Complaint filed: September 27, 2024  
Amended Complaint Filed: Jan. 27, 2025

1 PROPOUNDING PARTY: Electric Solidus, Inc., d/b/a Swan Bitcoin.

2 RESPONDING PARTY: Proton Management Ltd.

3 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff  
4 Electric Solidus, Inc., d/b/a Swan Bitcoin (“**Swan**”), by and through its counsel,  
5 respectfully requests that Defendant Proton Management Ltd. (“**Proton**”) produce the  
6 following documents to the offices of Quinn Emanuel Urquhart & Sullivan LLP, 865  
7 S Figueroa Street, Floor 10, Los Angeles, CA 90017-5003 which production shall be  
8 substantially completed within 30 days of service of these Requests. Each of the  
9 following requests (the “Requests,” and each, a “Request”) is continuing in nature,  
10 such that, if Proton obtains or discovers additional responsive documents and items  
11 at a later date, such documents and items are to be produced to Swan. These  
12 documents are to be produced according to the Definitions and Instructions herein.

13 **DEFINITIONS**

14 1. “**Action**” means the above-captioned litigation.

15 2. “**Communication**” means any act or instance of transferring,  
16 transmitting, passing, delivering, or giving information (in the form of facts, ideas,  
17 inquiries, or otherwise) by written or electronic means, including but not limited to  
18 statements, admissions, denials, inquiries, discussions, conversations, negotiations,  
19 agreements, contracts, notes (handwritten, typed, or otherwise), summaries,  
20 memoranda, reports, presentations, submissions or filings to any government agency  
21 or entity, understandings, meetings, or any other direct or indirect disclosure in any  
22 form, including but not limited to audio, video, digital, electronic, or paper form, and  
23 any draft Communication in such form, whether or not the Communication was ever  
24 disclosed, sent, or transmitted.

25 3. “**Document(s)**” means hard-copy documents or electronically-stored  
26 information (“ESI”) and shall include, without limitation, any communication,  
27 writing, drawing, graph, chart, recording, photograph, videotape, email, electronic  
28 file, data compilation, computer database, source code, or other item containing

1 information of any kind of nature, however produced or reproduced, whether an  
2 original or a duplicate, whatever its origin or location and regardless of the form in  
3 which such information exists or is maintained, including any documents shared via  
4 a Google Drive or Dropbox platform. A draft or non-identical copy is a separate  
5 document within the meaning of this term.

6 4. The term “**Proton**” or “**You**” means Defendant Proton Management Ltd.  
7 and any of its members, employees, representatives, officers, directors, managers,  
8 agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries, and any other  
9 entities or Persons acting or purporting to act on its behalf, including but not limited  
10 to Elektron Management LLC, Thomas Patrick Furlong, Michael Alexander (“Alex”)  
11 Holmes, Ilios Corp., Rafael Dias Monteleone, Santhiran (“San”) Naidoo, Enrique  
12 Romualdez, Lucas Vasconcelos, Aleksander Dozic, Bill Belitsky, Kartheek (“Kar”) Sola,  
13 Raphael Zagury, Brett Hiley, Maxwell (“Max”) Berg, and Tyler Effertz, as well  
14 as any agents of those Persons.

15 5. The term “**Elektron**” means any corporation, organization, partnership,  
16 or other entity doing business under the name “Elektron,” “Elektron Energy,” or  
17 similar name, including but not limited to Elektron Management LLC, and any of its  
18 members, employees, representatives, officers, directors, managers, agents, attorneys,  
19 assigns, predecessors, affiliates, parents, subsidiaries, and any other entities or  
20 Persons acting or purporting to act on its behalf, including but not limited to Thomas  
21 Patrick Furlong, Alex Holmes, Ilios Corp., Rafael Dias Monteleone, San Naidoo,  
22 Enrique Romualdez, Lucas Vasconcelos, Aleksander Dozic, Bill Belitsky, Kar Sola,  
23 Raphael Zagury, Brett Hiley, Max Berg, and Tyler Effertz, as well as any agents of  
24 those Persons.

25 6. “**Concern**” or “**Concerning**” means mentioning, concerning, showing,  
26 discussing, reflecting, relating to, referring to, describing, memorializing, embodying,  
27 constituting, analyzing, evidencing, supporting, or contradicting the matter referenced  
28 in the individual Request using this term.

1           7.     “**Complaint**” or “**Operative Complaint**” means the most recent  
2 complaint filed in this Action.

3           8.     The terms “**Person**” or “**Persons**” means any natural person or any legal  
4 entity, including, without limitation, any business or governmental entity or  
5 association.

6           9.     The term “**Swan**” means Electric Solidus, Inc. d/b/a Swan Bitcoin and  
7 any of its members, employees, representatives, officers, directors, managers, agents,  
8 attorneys, assigns, predecessors, affiliates, parents, subsidiaries, and any other entities  
9 or Persons acting or purporting to act on its behalf.

10          10.    The term “**Tether**” means Tether Investment Ltd. and any of its  
11 members, employees, representatives, officers, directors, managers, agents, attorneys,  
12 assigns, predecessors, affiliates, parents, subsidiaries, and any other entities or  
13 Persons acting or purporting to act on its behalf, including but not limited to Zettahash  
14 Inc.

15          11.    The term “**Marlin Capital**” means Marlin Capital Partners and any of  
16 its members, employees, representatives, officers, directors, managers, agents,  
17 attorneys, assigns, predecessors, affiliates, parents, subsidiaries, and any other entities  
18 or Persons acting or purporting to act on its behalf, including but not limited to  
19 Zachary Lyons and Jared Stein.

20          12.    The term “**GitHub**” means the web-based platform that allows  
21 developers to create, store, manage, share, and collaborate on code (and all services  
22 on that platform), offered by GitHub, Inc. (a subsidiary of Microsoft) and available at  
23 <https://github.com/>.

24          13.    The term “**2040 Energy**” means 2040 Energy Ltd., and any of its  
25 members, employees, representatives, officers, directors, managers, agents, attorneys,  
26 assigns, predecessors, affiliates, parents, subsidiaries, and any other entities or  
27 Persons acting or purporting to act on its behalf.

28          14.    The term “**Mining Site**” shall refer to a physical or virtual infrastructure

1 where computational resources are used to perform Bitcoin mining operations. A  
2 Mining Site typically includes specialized mining hardware such as application-  
3 specific integrated circuits (“ASICs”), power supply systems, and cooling systems.

4 15. The term “**Swan’s Trade Secrets**” means the methods, techniques,  
5 processes, models, tools, and other methods related to Bitcoin mining that Swan  
6 alleges Defendants have misappropriated, as described in Swan’s Complaint and  
7 Swan’s Identification of Asserted Trade Secrets (dated February 14, 2025).

8 16. The term “**Swan’s BNOC**” refers to Swan’s Bitcoin Network Operating  
9 Center, as described in Paragraphs 73-79 of the Complaint.

10 17. The terms “**all**,” “**any**,” and “**each**” shall be construed broadly and mean  
11 all, any, and each as necessary so as to bring within the scope of a Request all  
12 Documents that might otherwise be construed to be outside of its scope.

13 18. The terms “**and**” and “**or**” shall be construed either disjunctively or  
14 conjunctively as necessary so as to bring within the scope of a Request all Documents  
15 that might otherwise be construed to be outside of its scope.

16 19. The term “**including**” means including but not limited to.

17 20. The terms “**relating to**,” “**related to**,” and “**in connection with**” mean  
18 to any extent, relating to, referring to, reflecting, and their variants and shall be  
19 construed to bring within the scope of the requests any information and Document  
20 that explicitly or implicitly comprises, evidences, embodies, constitutes, describes,  
21 responds to, reflects, was reviewed in conjunction with, or was generated as a result  
22 of, the subject matter of the request.

23 21. The singular includes the plural and vice versa.

## 24 **INSTRUCTIONS**

25 1. Unless otherwise indicated, the responsive timeframe for the Requests is  
26 **June 1, 2024 to the present** (the “**Relevant Period**”). If a response to a Request  
27 necessitates a broader timeframe, You must provide responsive responses,  
28 notwithstanding that such responses apply to a timeframe before June 1, 2024.

1           2.     You must furnish all responsive, non-privileged Documents within  
2 Proton's possession, custody or control, including any Documents or  
3 Communications in Proton's constructive possession whereby Proton has the right to  
4 compel production of Documents from a third party, as well as those that are  
5 reasonably available to Proton, including Documents and Communications in the  
6 possession of Proton's agents, representatives, consultants, accountants, attorneys,  
7 advisors, investigators, or any and all Persons acting on Proton's behalf or at its  
8 direction.

9           3.     If You claim that the attorney-client privilege, attorney work product  
10 doctrine, or any other privilege applies to any Document or Communication, the  
11 production of which is called for by these Requests, state the part of each Request as  
12 to which you raise objection, set forth the basis of your claim of privilege with respect  
13 to such information as you refuse to give, and for each such Document or  
14 Communication, state, among other required information, its date, subject matter,  
15 author(s), recipient(s), custodian, and such additional information concerning the  
16 claim of privilege or work product doctrine as will permit the adjudication of the  
17 propriety of the claim of privilege.

18           4.     If a Document or other information is stored electronically, the  
19 Document or other information shall be produced in native electronic format. In  
20 conjunction with the production of any ESI, all metadata and other bibliographic or  
21 historical data that relates to such electronically stored information shall also be  
22 produced.

23           5.     The foregoing instructions are not intended to limit Your obligations  
24 under the Federal Rules of Civil Procedure or any other applicable rule, regulation, or  
25 law. As such, if any of the foregoing instructions is deemed to require the provision  
26 of less information than otherwise would be required by the Federal Rules of Civil  
27 Procedure or any other applicable rule, regulation, or law, then such other rule,  
28 regulation, or law is to govern in relevant part.



1           6.     If You object to the scope or breadth of a Request, state the objection  
2 and the basis for the objection in writing and with particularity, and produce  
3 documents that You believe are within the proper scope or breadth, notwithstanding  
4 Your objection.

5           7.     Review and reasonably search all relevant files of all appropriate entities  
6 and Persons within Your possession, custody, or control to produce documents  
7 responsive to each Request.

8           8.     Each Request is independent. No Request limits the scope of any other  
9 Request.

10          9.     Capitalized terms not defined herein shall have the meaning ascribed to  
11 them in the Complaint.

12          10.    The use of defined terms apply whether or not they are capitalized.

13          11.    The past tense shall be construed to include the present tense and vice  
14 versa.

15          12.    References to entities or corporations other than natural persons shall be  
16 deemed to include, in addition to the entity named, its divisions, departments,  
17 subsidiaries, affiliates, parents, predecessors, present or former officers, present or  
18 former directors, employees, agents, representatives, accountants and attorneys,  
19 successors, and all other Persons acting or purporting to act on behalf of each such  
20 entity or corporation.

21          13.    Subject to any subsequent stipulations entered into between the parties,  
22 all produced ESI shall be accompanied by searchable text as applicable, with metadata  
23 and in the format as specified in Instructions 14 and 15 below.

24          14.    You shall produce metadata associated with responsive Documents and  
25 make it reasonably accessible to Plaintiff, including the following categories of  
26 metadata: Beginning Bates Number, Ending Bates Number, Beginning Bates  
27 Number-Family, Ending Bates Number-Family, Custodian, File Name, File  
28 Extension, Author (from application metadata), From (for email messages), To (for



1 email messages), CC (for email messages), BCC (for email messages), Title (from  
2 application metadata) combined with email subject, DATE Sent and Received (for  
3 email messages), Time Sent and Received (for email messages), DATE Created, Time  
4 Created, DATE, DATE Modified, Time Modified, Page Count, MD5HASH, and  
5 TEXT. Swan reserves the right to request the production of native copies of  
6 responsive Documents where the produced metadata is incomplete.

7 15. Where the Documents responsive to a Request are stored electronically,  
8 the Documents shall be produced in the following form:

- 9 a. single-page TIFF files;
- 10 b. LFP or OPT load file and Concordance DAT file that includes, but  
11 is not limited to, the following metadata fields: author, recipient,  
12 from, cc, bcc, subject, attachment, family group, DATE and time  
13 sent, DATE and time created, DATE and time received, page  
14 count, beginning Document/Bates number and ending  
15 Document/Bates number;
- 16 c. for emails, msg files with file names that match the  
17 “BEG\_BATES” numbers;
- 18 d. for all other ESI, including any responsive Excel spreadsheets,  
19 databases, or other structured data, native files with file names that  
20 match the “BEG\_BATES” numbers; and
- 21 e. metadata load file formatted as either a Concordance DCB file or  
22 a delimited ASCII file, with 20; 254; 174 delimiters.

23 16. Non-ESI Documents shall be scanned, processed with optical character  
24 recognition (OCR), and produced in the same manner. Documents from any single  
25 file shall be produced in the same order as they were found in such file. All tabs,  
26 labels, folders, envelopes, jackets, or any identification of the source of the  
27 Documents shall also be scanned and produced as part of the Documents.

1 17. If no Documents, Communications, information, or things exist that are  
2 responsive to a particular Request, then that fact should be stated in the response to  
3 such Request.

4 18. As to any requested Documents or Communications which no longer  
5 exist, but which existed at one time, identify and describe such document(s) or  
6 communication(s) as completely as possible and identify the last known location of  
7 the document(s) or communication(s) and the reason the document(s) or  
8 communication(s) no longer exist.

9 19. If, after responding, You obtain or become aware of additional or  
10 different responsive information, then You must amend or supplement Your  
11 responses promptly.

12 **REQUESTS FOR PRODUCTION**

13 **REQUEST FOR PRODUCTION NO. 5:**

14 Documents sufficient to show Proton's corporate structure, including but not  
15 limited to Documents sufficient to identify Proton's parents, subsidiaries, and  
16 affiliates, as well as the identities of Proton's board of directors, officers, and  
17 managers.

18 **REQUEST FOR PRODUCTION NO. 6:**

19 Organizational charts for Proton's employees and consultants, including  
20 names, titles, and reporting lines.

21 **REQUEST FOR PRODUCTION NO. 7:**

22 All Documents and Communications concerning Proton's formation and  
23 registration, including but not limited to Documents and Communications concerning  
24 who caused Proton's incorporation and on which date that person did so, as well as  
25 all communications San Naidoo and Alex Holmes exchanged with anyone regarding  
26 Proton's formation and registration.

1 **REQUEST FOR PRODUCTION NO. 8:**

2 Documents sufficient to show Elektron's corporate structure, including but not  
3 limited to Documents sufficient to identify Elektron's owners, parents, subsidiaries,  
4 and affiliates, as well as the identities of Elektron's board of directors, officers, and  
5 managers.

6 **REQUEST FOR PRODUCTION NO. 9:**

7 Organizational charts for Elektron's employees and consultants, including  
8 names, titles, and reporting lines.

9 **REQUEST FOR PRODUCTION NO. 10:**

10 All Documents and Communications concerning Elektron's formation and  
11 registration, including but not limited to Documents and Communications concerning  
12 who caused Elektron's incorporation and on which date that person did so.

13 **REQUEST FOR PRODUCTION NO. 11:**

14 Documents sufficient to identify all persons who have been or are engaged to  
15 do work on Your behalf related to Bitcoin mining, including but not limited to those  
16 identifying Your employees, consultants, and other agents, including Documents  
17 sufficient to identify those persons' roles and responsibilities and the dates of their  
18 engagements.

19 **REQUEST FOR PRODUCTION NO. 12:**

20 All agreements and Communications related to agreements between You and  
21 any other person concerning Bitcoin mining, as well as any drafts, term sheets, or  
22 amendments related to same, as well as Communications related to the negotiation or  
23 execution of same, and including but not limited to (i) agreements between You and  
24 third parties and (ii) agreements between Your employees, consultants, and other  
25 agents and third parties.

26 **REQUEST FOR PRODUCTION NO. 13:**

27 Your agreements with the following persons, including but not limited to these  
28 persons' employment or consulting agreements with You: Thomas Patrick Furlong,

Alex Holmes, Ilios Corp., Rafael Dias Monteleone, San Naidoo, Enrique Romualdez, Lucas Vasconcelos, Aleksander Dozic, Bill Belitsky, Kar Sola, Raphael Zagury, Brett Hiley, Max Berg, Tyler Effertz.

**REQUEST FOR PRODUCTION NO. 14:**

All Documents and Communications related to the hiring (whether as an employee, consultant, or in another role) of Thomas Patrick Furlong, Alex Holmes, Ilios Corp., Rafael Dias Monteleone, San Naidoo, Enrique Romualdez, Lucas Vasconcelos, Aleksander Dozic, Bill Belitsky, Kar Sola, Raphael Zagury, Brett Hiley, Max Berg, and Tyler Effertz, including but not limited to their respective personnel files and human resource records.

**REQUEST FOR PRODUCTION NO. 15:**

All Documents and Communications concerning Your hiring (whether as an employee, consultant, or in any other role) any additional personnel or consultants to work in roles related to Bitcoin mining.

**REQUEST FOR PRODUCTION NO. 16:**

All Documents and Communications concerning Your assuming, taking over, being engaged to work on or otherwise working on responsibilities and/or roles related to Bitcoin mining that were previously maintained or held by Swan.

**REQUEST FOR PRODUCTION NO. 17:**

All Documents and Communications concerning the specific methods, tools models, or techniques that you use to select sites for, manage, operate, monitor, or otherwise oversee Bitcoin mining operations.

**REQUEST FOR PRODUCTION NO. 18:**

Documents sufficient to identify all Mining Sites at which You manage, operate, or otherwise oversee Bitcoin mining operations.

**REQUEST FOR PRODUCTION NO. 19:**

Documents sufficient to show Bitcoin mining operations that You considered or planned to manage, operate, or otherwise oversee, or that any other Person asked,

1 suggested, or discussed Your managing, operating, or otherwise overseeing, including  
2 Documents and Communications concerning the specific methods, tools, models, or  
3 techniques that you considered or planned to use in connection with such mining  
4 operations.

5 **REQUEST FOR PRODUCTION NO. 20:**

6 All Documents and Communications concerning the decrease or cessation of  
7 Bitcoin mining operations at any Mining Sites that Swan previously managed,  
8 operated, or otherwise engaged with, including but not limited to Communications  
9 and Documents regarding the removal of Bitcoin mining hardware, such as ASICs,  
10 power supply systems, and cooling systems, from those sites.

11 **REQUEST FOR PRODUCTION NO. 21:**

12 All Documents and Communications reflecting any correspondence between  
13 You and any current or former Swan employee or consultant discussing the topic of  
14 employment or potential employment at Proton or Elektron (or joining a company  
15 that was later formed as Proton or Elektron), as well as all of Your internal Documents  
16 and Communications regarding the employment or potential employment of any  
17 current or former Swan employee or consultant.

18 **REQUEST FOR PRODUCTION NO. 22:**

19 All Documents and Communications concerning Your actual, planned, or  
20 attempted recruitment of any persons who provided or currently provide services to  
21 Swan.

22 **REQUEST FOR PRODUCTION NO. 23:**

23 All Documents or Communications concerning or referencing Swan's Trade  
24 Secrets, including Documents and Communications concerning Your actual,  
25 considered, or planned use of Swan's Trade Secrets.

26 **REQUEST FOR PRODUCTION NO. 24:**

27 Documents that Your employees, consultants, and other agents downloaded,  
28 accessed, copied, were sent, or otherwise retained that relate to any of those persons'

1 engagements with Swan, including but not limited to the files identified in Exhibit G  
2 to the Complaint.

3 **REQUEST FOR PRODUCTION NO. 25:**

4 Communications concerning Your employees, consultants, and other agents'  
5 downloading, accessing, copying, or otherwise retaining Documents that they had  
6 access to as a result of any of those persons' engagements with Swan, including but  
7 not limited to the files identified in Exhibit G to the Complaint.

8 **REQUEST FOR PRODUCTION NO. 26:**

9 All Documents and Communications concerning any Proton employee,  
10 consultant, or other agent's obligations or potential obligations to Swan, including but  
11 not limited to those arising from such persons' employment or consulting agreements  
12 with Swan.

13 **REQUEST FOR PRODUCTION NO. 27:**

14 Documents and Communications sufficient to show any former or current  
15 Swan employee or consultant's job offer from Proton or Elektron (or an offer from a  
16 company that became Proton or Elektron), including all forms of compensation and  
17 benefits or promises thereof.

18 **REQUEST FOR PRODUCTION NO. 28:**

19 All Documents and Communications concerning any former or current Swan  
20 employee, consultant, or agent's development of Swan's Trade Secrets.

21 **REQUEST FOR PRODUCTION NO. 29:**

22 All Documents and Communications concerning Your business plans, strategic  
23 plans, operating plans, marketing plans, financial plans, sales plans, investment plans,  
24 market studies, and target market, including projections for revenue generation and  
25 profitability, related to Bitcoin mining management and operation.

26 **REQUEST FOR PRODUCTION NO. 30:**

27 Documents and Communications sufficient to show Your total financial  
28 investment, including but not limited to employee time, purchase of capital

1 equipment, and outside consultants, by quarter, into Your efforts to develop  
2 proprietary methodologies for Bitcoin mining operations including, but not limited to,  
3 the development of any dashboard or monitoring system related to Bitcoin mining  
4 operations.

5 **REQUEST FOR PRODUCTION NO. 31:**

6 All Documents and Communications concerning Your actual, planned, or  
7 attempted development or use of any dashboard or monitoring system related to  
8 Bitcoin mining operations, including but not limited to any dashboard or monitoring  
9 system similar to Swan's BNOC or intended to serve as a replacement to Swan's  
10 BNOC.

11 **REQUEST FOR PRODUCTION NO. 32:**

12 All Documents and Communications concerning any comparison between any  
13 dashboard or monitoring system related to Bitcoin mining operations that You use to  
14 Swan's BNOC.

15 **REQUEST FOR PRODUCTION NO. 33:**

16 All Documents and Communications concerning any comparison between  
17 Swan's Trade Secrets and any techniques, methods, or tools You use to manage,  
18 operate, or otherwise engage in Bitcoin mining activities.

19 **REQUEST FOR PRODUCTION NO. 34:**

20 Documents and Communications concerning Your efforts to keep the  
21 techniques, methods, or tools You use to manage, operate, or otherwise engage in  
22 Bitcoin mining activities secret or confidential.

23 **REQUEST FOR PRODUCTION NO. 35:**

24 Documents and Communications concerning any actual or considered  
25 indemnification of You and/or Your employees, consultants, or other agents  
26 concerning activities related to Bitcoin mining, including but not limited to (i) any  
27 agreements under which any third party has agreed to indemnify You and/or Your  
28



1 employees, consultants, and other agents; and (ii) any agreements under which You  
2 have agreed to indemnify Your employees, consultants, and other agents.

3 **REQUEST FOR PRODUCTION NO. 36:**

4 Documents sufficient to identify all persons who own any interest in You,  
5 including Documents sufficient to identify when those persons acquired that interest  
6 and the size and nature of that interest.

7 **REQUEST FOR PRODUCTION NO. 37:**

8 Documents sufficient to identify all persons in whom you own any interest,  
9 including Documents sufficient to identify when You acquired that interest and the  
10 size and nature of that interest.

11 **REQUEST FOR PRODUCTION NO. 38:**

12 Documents and Communications concerning any actual, planned, or attempted  
13 investment in You by any person, including but not limited to Communications You  
14 sent to any actual or potential investors.

15 **REQUEST FOR PRODUCTION NO. 39:**

16 Documents and Communications concerning any valuation of Your business,  
17 including but not limited to any valuations of any subparts of that business, such as  
18 services You provide related to Bitcoin mining.

19 **REQUEST FOR PRODUCTION NO. 40:**

20 Financial statements, including but not limited to income statements, balance  
21 sheets, cash flow statements, statement of shareholders' equity, and other financial  
22 and/or accounting statements showing income and/or expenses, assets and liabilities,  
23 equity, cash flows, and capital accounts of any type related to services you provide  
24 related to Bitcoin mining.

25 **REQUEST FOR PRODUCTION NO. 41:**

26 All Communications between You and persons associated with the Mining  
27 Sites You manage, operate, or otherwise engage with related to Bitcoin mining  
28

1 activities, including but not limited to all Communications exchanged via Signal,  
2 Telegram, and WhatsApp.

3 **REQUEST FOR PRODUCTION NO. 42:**

4 Communications concerning Your actual, planned, inadvertent, or attempted  
5 efforts to delete, conceal, or spoliage evidence related to the subject matter of this  
6 Action.

7 **REQUEST FOR PRODUCTION NO. 43:**

8 Communications concerning the use of ephemeral messaging applications  
9 (such as Signal, Telegram, or WhatsApp) for You and/or Your employees,  
10 consultants, and other agents' communications, including but not limited to  
11 Communications concerning switching from non-ephemeral messaging applications  
12 to ephemeral ones.

13 **REQUEST FOR PRODUCTION NO. 44:**

14 Documents and Communications concerning Your involvement in the actual,  
15 planned, or attempted sale of ASICs or other hardware or infrastructure related to  
16 Bitcoin mining, including your valuation of any ASICs for the purpose of a sale or  
17 attempted or planned sale.

18 **REQUEST FOR PRODUCTION NO. 45:**

19 Documents and Communications concerning Your or Your employees,  
20 consultants, and other agents' concealment of assets, transfer of assets to third parties,  
21 or attempts to limit Swan's ability to recover assets in connection with this Action.

22 **REQUEST FOR PRODUCTION NO. 46:**

23 Documents sufficient to identify the amount and location of Your assets,  
24 including but not limited to identifying all Bitcoin owned or controlled by You and/or  
25 Your employees, consultants, and other agents.  
26  
27  
28

1 **REQUEST FOR PRODUCTION NO. 47:**

2 All Documents and Communications concerning Your holding Yourself or  
3 Your employees, consultants, and other agents out as former Swan employees,  
4 consultants, or agents.

5 **REQUEST FOR PRODUCTION NO. 48:**

6 All Documents and Communications that You sent to actual or prospective  
7 customers, investors, vendors, business partners, funding sources, or other parties  
8 referencing or containing Swan's name, logo, or the names of Swan personnel.

9 **REQUEST FOR PRODUCTION NO. 49:**

10 All Documents and Communications concerning any statements made by You  
11 and/or Your employees, consultants, independent contractors, and other agents  
12 disparaging or otherwise saying anything negative about Swan.

13 **REQUEST FOR PRODUCTION NO. 50:**

14 All Documents and Communications concerning any statements made by You  
15 and/or Your employees, consultants, independent contractors, and other agents  
16 praising or otherwise saying anything positive about Swan.

17 **REQUEST FOR PRODUCTION NO. 51:**

18 All Documents or Communications concerning Your employees, consultants,  
19 and other agents' who formerly provided services to Swan ceasing their engagements  
20 with Swan, including but not limited to Documents or Communications concerning  
21 such persons' resignations from Swan.

22 **REQUEST FOR PRODUCTION NO. 52:**

23 All Documents and Communications concerning the reasons why any of Your  
24 employees, consultants, and other agents who formerly provided services to Swan no  
25 longer provide those services to Swan, including but not limited to Documents and  
26 Communications concerning why any such persons resigned from Swan.

27  
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1 **REQUEST FOR PRODUCTION NO. 53:**

2 All Communications between You and Marlin Capital, including but not  
3 limited to Communications between You and Zachary Lyons.

4 **REQUEST FOR PRODUCTION NO. 54:**

5 Documents sufficient to identify all travel by You, including but not limited to  
6 Your employees, consultants, and other agents, to California and/or the United States  
7 during the Relevant Period.

8 **REQUEST FOR PRODUCTION NO. 55:**

9 Documents and Communications regarding business, customer, corporate, or  
10 other relationships between You and Ilios Corp.

11 **REQUEST FOR PRODUCTION NO. 56:**

12 Documents and Communications between You and any United States  
13 governmental agency, California governmental agency, or Wyoming governmental  
14 agency.

15 **REQUEST FOR PRODUCTION NO. 57:**

16 Documents sufficient to identify the GitHub repository or repositories used to  
17 store any source code used by You related to Bitcoin mining.

18 **REQUEST FOR PRODUCTION NO. 58:**

19 All Documents, including source code, maintained on GitHub by the GitHub  
20 organization “elektron-tech,” including but not limited to all Documents housed in  
21 the repository named “nxt.”  
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1 DATED: February 26, 2025

QUINN EMANUEL URQUHART &  
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2  
3 By /s/ Ryan S. Landes

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 26, 2025, a copy of PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT PROTON MANAGEMENT LTD was served via electronic mail to counsel for Proton.

DATED: February 26, 2025

QUINN EMANUEL URQUHART &  
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By /s/ Stacylyn M. Doore  
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